

REMARKS

Reconsideration and allowance of this application, as amended, is respectfully requested.

This amendment is in response to the Office Action dated September 28, 2010.

By the present amendment, each of the independent claims 7 and 14 has been amended to clarify the claim language in response to the 35 USC §112, second paragraph, rejection set forth in paragraph 7 on page 3 of the Office Action. Specifically, the term "a count value" has been changed "the count value" in the claims to correspond to the antecedent basis previously provided for the term "count value." Therefore, reconsideration and removal of the 35 USC §112, second paragraph, rejection is respectfully requested.

Reconsideration and removal of the 35 USC §112, first paragraph, rejection is also respectfully requested. In this rejection, it is stated that although the specification teaches that the counter indicates a bit address of the claimed second information, it fails to teach the counter indicating a bit address for the claimed first information, as set forth in both claims 7 and 14. Applicants respectfully submit that the support in the specification for the counter indicating the bit address of the first information can be found on page 11, line 19 et seq. which states:

"When the first random number 11 set in the memory address counter 13 is counted up or counted down to 0" by a clock from the reception unit, the output of the first flip-flop 18 is set to L so that information in the memory 16 such as the identification number 17 is sent out according to a memory address."

It is respectfully submitted that this clearly indicates that the bit address of the "first information" is indicated by the memory address counter. Therefore, reconsideration and removal of the 35 USC §112, first paragraph, rejection is respectfully requested.

Reconsideration and removal of the 35 USC §103 rejection against independent claims 7 and 14 and their respective dependent claims over the primary reference to Bandy (USP 6,002,344) in view of Barret, Jr., (USP 4,471,345), Augenblick (USP 3,944,928) and Rainbaul (USP 6,166,858) is also respectfully requested. With regard to this, it is noted that the independent claims 7 and 14 both define a memory address counter which indicates a bit address of the memory and performs a counting operation with a first random bit number (e.g., 11) set, wherein the memory address becomes 0 according to the counting operation, together with the features that the identification number is stored in the memory address and then sent out, such that the memory address counter can control anti-collision with a simple circuit configuration. This is discussed, for example, on page 11, lines 11 et seq., of the specification.

In the Office Action, it is argued on page 11 in the second paragraph thereof, that Bandy meets these claim limitations. In particular, reliance is made on the counter/shift register 312 discussed in column 5, lines 4 et seq., and shown in Fig. 3 of Bandy as meeting the claim limitations for the memory address counter. However, it is respectfully submitted that the counter/shift register 312 shown in Bandy is simply a counter, and does not meet the specific limitations for a "memory address counter" defined in the independent claims 7 and 14. Specifically, in the independent claims 7 and 14, the memory address counter:

- 1) indicates the bit address of the memory;

- 2) performs a counting operation towards zero in accordance with the first random number being set;
- 3) when the counting reaches 0 according to the counting operation, the first information stored in the bit address indicated by the memory address counter is sent out to the reception unit successively;
- 4) "to thereby avoid collision with the transmitted information from said other IC tags."

In essence, the claimed memory address counter and Bandy's counter/shift register 312 are simply different arrangements with different purposes. In the last paragraph on page 11 of the Office Action (bridging to page 12), an attempt is made to read the different structure and operation of the counter/shift register 312 of Bandy on the current claims, but it is noted that this paragraph does not address the four features listed above which are achieved by the claimed memory address counter.


Therefore, reconsideration of the equating of the claimed memory address counter with the counter/shift register of Bandy is respectfully requested, together with removal of this rejection and allowance of the independent claims 7 and 14.

In addition, reconsideration and allowance of the dependent claims is also respectfully requested. In each case, these claims define specific further detailed features of the invention which, when considered in combination with the features of the parent independent claims 7 and 14, serve to define overall combinations clearly neither taught nor suggested by the cited prior art. Therefore, reconsideration and allowance of these dependent claims is also respectfully requested.

If the Examiner believes there are any matters which can be resolved by way of either a personal or telephone interview, the Examiner is invited to contact Applicant's undersigned attorney at the number indicated below.

To the extent necessary, Applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to the Antonelli, Terry, Stout & Kraus, LLP Deposit Account No. 01-2135 (Docket No. 843.45150X00), and please credit any excess fees to such deposit account.

Respectfully submitted,
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